

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**SPECTRUM LABORATORIES,  
LLC., an Ohio Limited Liability  
Company.**

*Plaintiff,*

**V.**

**ROYAL FRAGRANCES LLC d/b/a  
CITY SUPPLY WHOLESALE;  
SA & AP INVESTMENTS, LLC;  
TREK THE WORLD LLC; LEGACY  
ECOM LLC; NAGARIA USMAN  
GHANI LLC; PRECISION  
TECHNOLOGY CONSULTING,  
LLC; SAIF ALI; MOHD LODI;  
AFEE PARPIA,**

*Defendants.*

**CIVIL ACTION NO. 4:22-cv-03705**

**JUDGE CHARLES ESKRIDGE**

## PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL OF CERTAIN PARTIES

In accordance with Fed. Civ. R. 41(a)(1)(A)(i), Plaintiff Spectrum Laboratories LLC hereby dismisses the following Defendants by notice without prejudice: (i) Royal Fragrances LLC, (ii) Saif Ali, (iii) SA & AP Investments LLC, and (iv) Legacy Ecom LLC.

*[Signatures on Following Page]*

DATED: December 30, 2022

Respectfully submitted,

By: /s/ David B. Cupar

David B. Cupar (*pro hac vice*)  
*Attorney in Charge*  
Ohio Bar No. 71622  
dcupar@mcdonaldhopkins.com  
Matthew J. Cavanagh (*pro hac vice*)  
Ohio Bar No. 79522  
mcavanagh@mcdonaldhopkins.com  
**MCDONALD HOPKINS LLC**  
600 Superior Avenue, East  
Suite 2100  
Cleveland, Ohio 44114  
Telephone: 216.348.5400  
Facsimile: 216.348.5474

By: /s/ Courtney Ervin

Courtney Ervin  
Texas Bar No. 24050571  
SDTX No. 611093  
cervin@hicks-thomas.com  
Kasi Chadwick  
Texas Bar No. 24087278  
SDTX No. 2421911  
kchadwick@hicks-thomas.com  
**HICKS THOMAS LLP**  
700 Louisiana St., Suite 2000  
Houston, Texas 77002  
Telephone: 713.547.9100  
Facsimile: 713.547.9150

**ATTORNEYS FOR PLAINTIFF  
SPECTRUM LABORATORIES, LLC**

**Consent to form and entry by:**

By: /s/ Theodore Lapus (with permission)

Theodore Lapus

Texas Bar No. 24039484

SDTX No. 556292

tlapus@lgacus.com

**LAI, CORSINI & LAPUS, LLC**

5800 Ranchester Drive, Suite 200

Houston, Texas 77036

Telephone: 713.988.5666

Facsimile: 713.988.8846

**ATTORNEY FOR DEFENDANT ROYAL  
FRAGRANCES LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 30, 2022, a copy of this instrument was served on counsel of record as listed below via the Court's ECF noticing system.

Theodore Lapus  
[tlapus@lgacus.com](mailto:tlapus@lgacus.com)  
LAI CORSINI & LAPUS, LLC  
5800 Ranchester Drive, Suite 200  
Houston, TX 77036  
*Attorneys for Defendant Royal  
Fragrances LLC*

/s/ Courtney Ervin

Courtney Ervin